

Future Airspace Strategy Implementation (FASI)

London Terminal Manoeuvring Area (LTMA)

Airspace Change Proposal (ACP)

ACP-2020-043

ACP-2020-044

ACP-2020-045

Stage 2 Develop and Assess

Biggin Hill Airport Arrivals Connectivity Module

To be read in conjunction with Master Document

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NATS

1. Introduction

1.1 About this document

- 1.1.1 This document describes the arrival connectivity options for Biggin Hill Airport, which have been developed using the methodology described in Section 2 of the Master document.
- 1.1.2 Biggin Hill is a single runway airport sited to the southeast of Greater London. It handles a range of traffic from private aviation to large business jets. Most common destinations are flights to France, Switzerland, the Netherlands, Spain and destinations within the UK.

2. Baseline

- 2.1.1 This description of the current airspace around Biggin Hill should be considered the ‘Do Nothing’ option if no airspace change was to take place.
- 2.1.2 Table 1 shows actual¹ airport traffic counts from the 2019 baseline traffic year to 2022. The NERL forecast for network traffic levels is shown in the Master document Section 3.9. Airport forecasts are independent of the network and will be included within airport ACPs.

Year	Arrivals	Departures	Total Movements
2019	8,617	8,576	17,193
2020	7,523	7,487	15,010
2021	9,570	9,485	19,055
2022	13,179	13,097	26,276

Table 1 Actual air traffic movements: Biggin Hill airport 2019-2022

- 2.1.3 Biggin Hill currently shares the London City arrival procedures, shown in Figure 1 and Table 2. All traffic is routed to a Point Merge structure to the east for arrival sequencing. Two holds, JACKO and GODLU, provide for delay absorption if required.

Airport	Hold	STARs	Associated ATS Routes
Biggin Hill	JACKO	XAMAN 1C, SUMUM 1C, SILVA 1C, LISTO 1C, HON 1C	L608, Q63, L980, (U)Q4/Z197, UL612/L10
	GODLU	KATHY 1C, SAM 1C, SIRIC 1C, AVANT1C, NEVIL 1C, SOVAT 1C, KONAN 1C	L980, L620, L89, P2, M189, L9, L613

Table 2 Current arrival connectivity for Biggin Hill

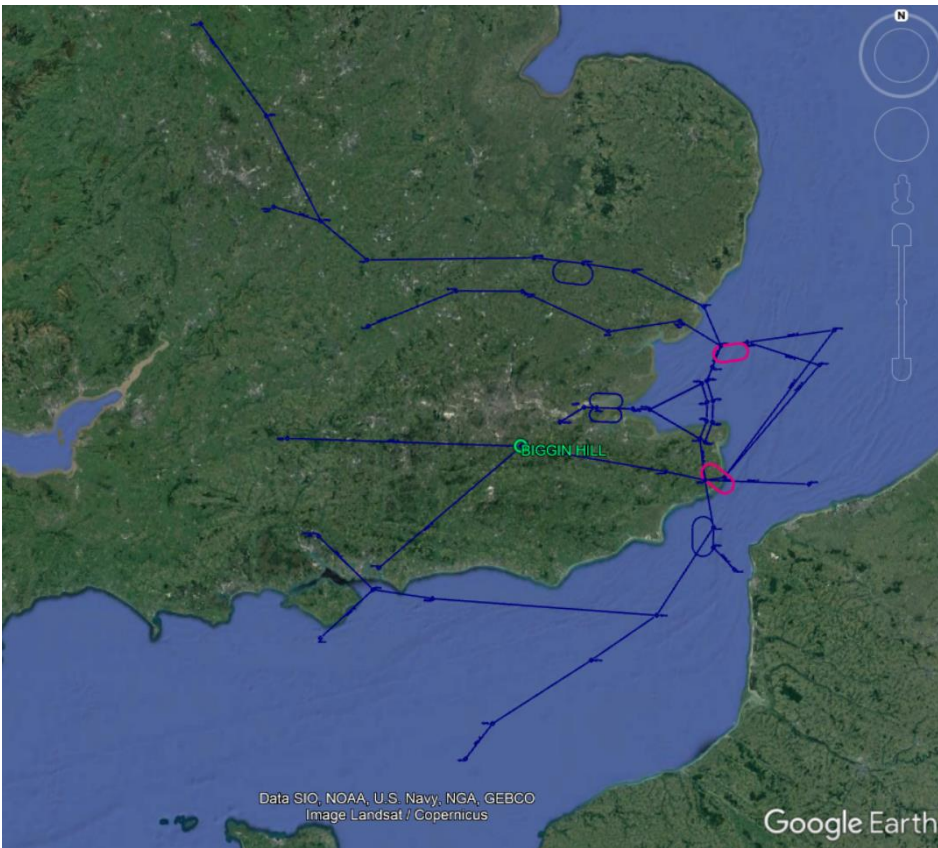
- 2.1.4 Biggin Hill does not have SIDs but has Standard Departure Routes² (SDRs) which join with the ATS route network at designated waypoints (Table 3).

Departure to	Designator	Via	Route
North	Brookmans Park 2 (BPK 2)	L10/N601	DET - N601 - BPK
Northeast	DAGGA 2	M604	DET - M604 - DAGGA
Southeast	Dover 2 (DVR 2)	L9/L10/Q70	DET - L6 - DVR/DET - Q70 - VABIK
South & Southwest	Lydd 2 (LYD 2)	M189	DET - LYD
West	SAXBI 2	N27	DET - N601 - BPK - SAXBI

Table 3 Current departure connectivity for Biggin Hill

¹ This is based on CFMU actual data for 2019; this may vary from airport data.

² SDRs are all below 7,000ft and will be subject to Airport ACP. NERL will ensure network connectivity.



Key:
 STARs including en-route holds
 Terminal holds

Figure 1 Current arrival procedures for Biggin Hill

2.1.5 Figure 2 shows a radar density plot of Biggin Hill arrival traffic for a typical busy summer week and indicates traffic distribution. Most of the traffic (about 65%) arrives from the east and southeast.

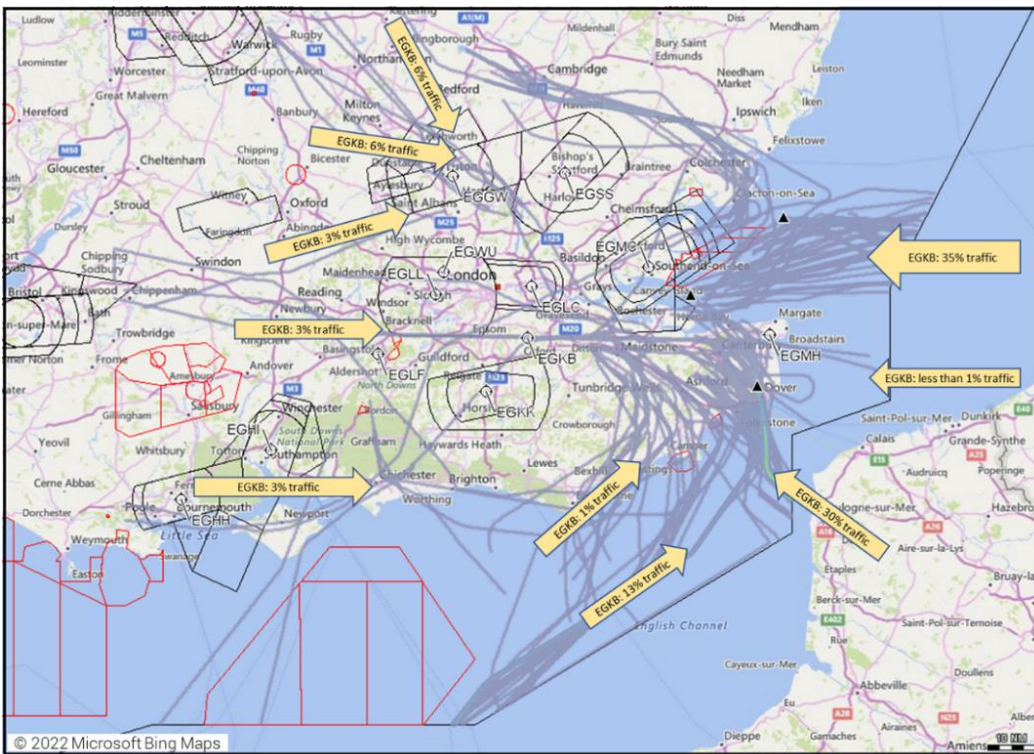


Figure 2 Biggin Hill traffic density arrivals FL245-FL70 5-11 August 2019

2.1.6 Small jets are the most prevalent aircraft type at Biggin Hill, as shown in Table 4. NetJets was the most prevalent operator in 2019, with almost 10% of the traffic.

Biggin Hill – Aircraft Type		
Aircraft Group	Movements	% traffic
Small Jet	11,878	69%
Medium Jet	2,088	12%
Heavy Jet	0	0%
Turboprop/Piston/Prop	3,196	19%

Biggin Hill – Top 4 Aircraft Operator Usage		
Operator	Movements	% traffic
NetJets	1,635	9.5%
Zenith Aviation	782	4.6%
Globe Air	497	3%
Air Hamburg	437	2.6%

Table 4 Aircraft type and top carriers - Biggin Hill

3. Design Development

- 3.1.1 Working with the airport, NERL developed 15 high-level concept options for Biggin Hill³. NERL has assessed that based on required traffic loading, Biggin Hill would require at least one hold, either attached to an RMA or attached to a systemised arrival structure.
- 3.1.2 Early engagement with Biggin Hill identified a desire for an arrival option from the west of the airport. This would only be potentially viable if provided in addition to a facility to the eastern area, given the airspace constraints. Any options for the west are therefore considered in addition to an eastern facility and would be for arrivals from the west only.
- 3.1.3 Initial viability assessments were produced for location and structure type (Figure 3) and presented to stakeholders in formal engagement (Ref 7). Feedback was requested through the engagement response questionnaire.

Arrival Structure Viability Assessment									
Arrival Structure Type	Location								
	N	NE	E	SE	S	SW	W	NW	OH
Do nothing	✗	✗	✗	✗	✗	✗	✗	✗	✗
Optimised (inner) hold(s)	✗	✓	✓	✓	✗	✓	✓	✗	✓
Hold(s) further out	✗	✓	✓	✓	✗	✓	✓	✗	✗
Point merge	✗	✗	✓	✗	✗	✗	✗	✗	✗
Switch merge	✗	✗	✓	✗	✗	✗	✗	✗	✗
Trombone	✗	✓	✓	✗	✗	✗	✗	✗	✗

Viable Option: taken forward to engagement

Not considered a viable option: eliminated at this point

Figure 3 Engagement Initial Viability Matrix

3.2 Stakeholder engagement

- 3.2.1 We received 7 responses from 7 different stakeholders related to the Biggin Hill design concepts. Table 5 presents a summary of the feedback and how this has influenced the design.
- 3.2.2 Some feedback was related to deconfliction and interaction with other traffic flows, which led to a revision of the design envelope.
- 3.2.3 Feedback also recognises that Biggin Hill is an airport with lower traffic demand compared to others in the LTMA and suggests this should be a consideration in the design development. This feedback has been used to inform the Design Principle Evaluation.
- 3.2.4 No new options were developed as a result of the stakeholder engagement, but engaged-upon options were removed and an additional added due to SME development (see paragraphs 3.3.3 and 3.3.4).

³ See Master document Section 2.2 for a detailed description of this work.

Stakeholder	Feedback ('You said')	Response ('We did')
Airspace4All	Supports holds at minor airports, with direct routings, to keep track miles minimal	Feedback was used to inform the evaluation of DP1, DP2, DP3 & DP8 for each airport.
Biggin Hill	All route options still being considered	The current set of options facilitates departure and arrival routes from all directions.
British Airways	Considering the number of movements at Biggin Hill, this must be deprioritized to facilitate Heathrow and Gatwick efficiencies	At this stage, no airport will be prioritised over another, as we strive for a balanced network-wide design. Stage 3 development will identify prioritisation needs.
BGA	Traffic demand at Biggin Hill is low. Any network supporting structure should be proportionate to this level of traffic	Feedback was used to inform the evaluation of DP5 & DP6 for each airport.
Gatwick Airport Limited	Biggin Hill arrival options to the south will interact with Gatwick's arrival and departure routes to the north and east	Design envelope refined but remains appropriate while retaining flexibility for both Gatwick and Biggin Hill traffic. No change to viability matrix as a result of this feedback.
London City Airport	Deconfliction with London City arrivals is important to ensure capacity isn't constrained	Consideration of the viability of a shared facility continues in Stage 2 (see Master document, paragraph 2.2.12). The appropriate deconfliction or colocation of routes will be considered at Stage 3
Southend Airport	Arrival structures from the east would potentially conflict with Southend traffic as well as London City	It is reasonable in Stage 2 to continue development where design envelopes overlap (see Master document, paragraph 2.2.11). The appropriate deconfliction or colocation of routes will be considered at Stage 3

Table 5 Engagement feedback and NERL response

3.3 Biggin Hill Design Concepts

- 3.3.1 Table 6 summarises the high-level qualitative considerations for potential locations for Biggin Hill arrival structures, and Table 7 summarises the viability assessment for the arrival structures suitable for Biggin Hill. These have been developed from SME input and stakeholder engagement.
- 3.3.2 Not every arrival structure concept may be viable in every location; the Viability Matrix (Figure 5) illustrates the possible combinations.
- 3.3.3 An additional design option was added for a northeast Point Merge, this was based on SME input and aligns with the London City option.
- 3.3.4 As described in the Master document paras 2.4.2 & 2.4.3, the concepts Holds Further Out and Trombones were removed as viable concepts at this stage. A detailed description of each structure can be found in Section 5 Appendix 1.

Location	Viability Considerations
North	An arrival structure, and associated connectivity, to the north of the airfield would likely conflict with Heathrow, London City, Luton, Northolt, Southend and Stansted traffic.
Northeast	There is sufficient airspace to enable an arrival structure, and associated connectivity, to the northeast of the airfield, subject to deconfliction with Heathrow, London City and Stansted traffic and the Shoeburyness DA Complex.
East	An arrival structure to the east of the airfield is already in place within the current design, albeit shared with another sponsor. A structure in this area remains possible, subject to deconfliction with Heathrow, London City and Southend traffic and the Shoeburyness DA Complex.
Southeast	There is sufficient airspace to enable an arrival structure, and associated connectivity, to the southeast of the airfield, subject to deconfliction with Gatwick, Heathrow, and London City traffic. However, the size of the structure may be limited due the FIR boundary.
South	An arrival structure, and associated connectivity, to the south of the airfield would likely conflict with Gatwick and Heathrow traffic.
Southwest	A dedicated arrival structure, and associated connectivity southwest of the airfield would likely conflict with Gatwick and Heathrow traffic. A shared arrival facility may be possible.
West	A dedicated arrival structure, and associated connectivity west of the airfield would likely conflict with Heathrow traffic. A shared arrival facility may be possible.
Northwest	An arrival structure, and associated connectivity, to the northwest of the airfield would likely conflict with Heathrow traffic.
Overhead	There is sufficient airspace to enable an arrival structure, and associated connectivity, overhead the airfield, subject to deconfliction with Gatwick, Heathrow, London City and Northolt traffic.

Table 6 Biggin Hill Arrivals: Location viability considerations – post engagement

Structure	Viability Considerations
Optimised (inner) holds	There is sufficient airspace for optimised hold(s), and this would likely meet the runway throughput demands.
Point Merge	Optimisation of the current day structures. There is sufficient airspace to suitably place a Point Merge. Based on traffic throughput, this may need to be a shared facility.
Switch Merge	There is insufficient airspace to suitably place a Switch Merge.

Table 7 Biggin Hill Arrival structures: Viability considerations – post engagement

- 3.3.5 Figure 4 shows the Biggin Hill design envelope, developed by SMEs through collaborative workshops and formal engagement with Biggin Hill and other stakeholders. This design envelope is based on the viability considerations presented in section 3.3 above, including Table 6 & Table 7, developed through two-way engagement as shown in Table 5.
- 3.3.6 Airspace design constraints, as described in the Master document Section 3.5, are highlighted in orange. A consideration for Biggin Hill is the Shoeburyness Danger Area as shown.

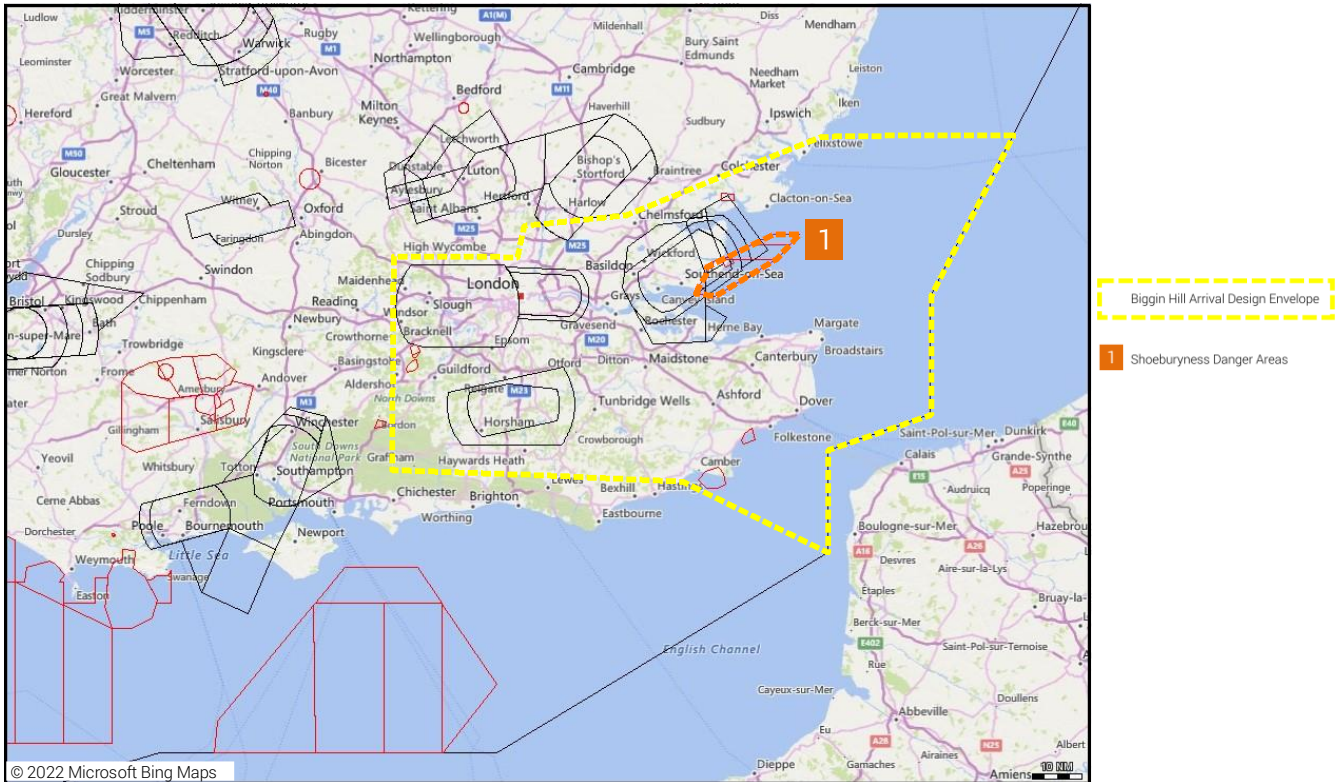


Figure 4 Biggin Hill Design Envelope & design constraints – post engagement & SME development

3.3.7

The Biggin Hill Design Concepts considered viable at this stage, within the Design Envelope presented above, are shown in the Biggin Hill Arrival Structure Viability Assessment (Figure 5).

Arrival Structure Viability Assessment											
Arrival Structure Type	Location										
	N	NE	E	SE	S	SW	W	NW	OH		
Do nothing	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗
Optimised (inner) hold(s)	⊗	⊙	⊙	⊙	⊗	⊙	⊙	⊗	⊙	⊙	⊙
Point merge	⊗	⊙	⊙	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗
Switch merge	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗



 Viable Option: taken forward to DPE
 Not considered a viable option: eliminated at this point

Figure 5 Biggin Hill Design Options Comprehensive Viability Matrix

3.3.8

These 8 viable options were taken forward as the comprehensive list to Design Principle Evaluation, along with 'Do Nothing'.

3.4 Design Principle Evaluation

3.4.1 Table 8 shows the DPE assessment criteria. SMEs, in this case air traffic control experts and airspace change experts, list topics associated with each DP and qualitatively test how each option would react to those topics, describing how a red/amber/green outcome is reached.

DP	Priority	Description	SME subjective assessment topics, include but not limited to	Red	Amber	Green
0	A AMS	Safety Safety is always the highest priority (Note: Red could not be solved by mitigation, amber may be able to be solved by mitigation).	Human performance (ATCO control-ability) Human performance (pilot fly-ability) IFP (fly-ability) Surrounding airspace users (inside/outside of CAS) Impact if ATM tools fail	Unacceptable level of safety risk	Diminished - Issue(s) identified could result in an elevated level of safety risk when compared to today's operation	Enhanced - improvement over today's level of safety. Maintained - safety risk could be maintained within acceptable levels of today's operation
1	B AMS	Operational The airspace will enable increased operational resilience	<u>Network</u> Weather avoidance Disruption in neighbouring ANSPs	Reduced resilience and capacity during disruption	Similar resilience and capacity during disruption	Increased resilience and capacity during disruption
			<u>Airport</u> Holding levels Delay absorption between hold and 7,000ft	Reduction in delay absorption	Delay absorption similar to today	Improve delay absorption
			<u>Airport</u> Time to restart after runway closure Number of aircraft off the hold	Reduction in disruption recovery	Disruption recovery similar to today	Improve disruption recovery
2	B	Economic Optimise network fuel performance	Track mileage Economic performance Aircraft height Method of delay absorption	Fuel performance worsened	Fuel performance similar to today	Fuel performance improved
3	B AMS	Environmental Optimise CO ₂ emissions per flight	Track mileage GHG performance Aircraft height Method of delay absorption	CO ₂ emissions worsened	CO ₂ emissions similar to today	CO ₂ emissions improved
4	C	Environmental Minimising of noise impacts due to LAMP influence will take place in accordance with local needs	Overall environmental impact Environmental impact below 7,000ft Impact on tranquillity (or visual intrusion)	LAMP influence not aligned with local ACP sponsors' needs	Extent of alignment not yet known	LAMP influence fully aligned with local ACP sponsors' needs

DP	Priority	Description	SME subjective assessment topics, include but not limited to	Red	Amber	Green
5	C	Technical The volume of controlled airspace required for LAMP should be the minimum necessary to deliver an efficient airspace design, taking into account the needs of the UK airspace users	Lateral footprint of CAS Vertical footprint of CAS Proportional to airport traffic levels	Airspace required not the minimum necessary to deliver an efficient design	Extent of airspace required not yet known Or Similar CAS to today	Airspace required the minimum necessary to deliver an efficient design
6	C AMS	Technical The impacts on GA and other civilian airspace users due to LAMP will be minimised	Change to boundaries of CAS Changes to CAS classification Safety based impacts	Excessive negative impacts	Negative impacts minimised but requires changes to other airspace users' activities Or Similar impacts to today	Positive impacts to other airspace users' current activities
7	C AMS	Technical The impacts on MoD users due to LAMP will be minimised	Overall amount of danger area available Amount of time for danger area available Flexible use airspace provision Change to access between danger areas Safety based impacts Radar corridor access	Negative impacts not minimised or would require excessive changes to current MoD operations	Negative impacts minimised but requires changes to current MoD operations Or Extent of impact not yet known	Negative impacts minimised or no negative impact on current MoD operations
8	B AMS	Operational Systemisation will deliver the optimal capacity and efficiency benefits (Note: This is about airspace capacity, not ground infrastructure capacity which could be the limiting factor to overall airport capacity).	Traffic throughput Sectorisation Effect on overall network capacity Effect on airports' arrival flow	Design option unable to support the forecast traffic loading for the airport and the network	Design option supports the forecast traffic loading for the airport or the network	Design option supports the forecast traffic loading beyond the reference period for both the airport and the network
			Overall ATCO workload Levels of tactical intervention (radio transmissions per flight) No increase to operations requirements Balancing out of hot spots	Design option increases ATCO workload	ATCO workload similar to today	Design option decreases ATCO workload

DP	Priority	Description	SME subjective assessment topics, include but not limited to	Red	Amber	Green
9	B AMS	<p>Technical The main route network linking airport procedures with the En Route phase of flight will be spaced to yield maximum safety and efficiency benefits by using an appropriate standard of PBN</p> <p>(Note: The main route network is considered as FL70 - FL245. Approach structures are not considered as 'the main route network').</p>	Airspace requirement vs. RNAV rating Required aircraft equipage standards	PBN standard applied to route spacing would maintain or decrease efficiency and maintain safety	PBN standard applied to route spacing would limit efficiency and safety benefits	PBN standard applied to route spacing is likely to maximise efficiency and safety benefits
10	A	<p>Policy Must accord with the CAA's published Airspace Modernisation Strategy (CAP1711) and any current or future plans associated with it.</p>	<p><u>AMS "Ends" Strategic Objectives</u> Safety (DP0) Integration of diverse users (DP6 and DP7) Simplification (DP1, DP8 and DP9) Environmental sustainability (DP3)</p>	No or limited alignment with the AMS	Partial alignment with the AMS	Aligned with the AMS

Table 8 Design Principle Evaluation Assessment Criteria

3.4.2 Table 9 shows the AMS assessment criteria which are used to determine the overall RAG status for DP10.

DP10 outcome	Criteria for DP0, DP1, DP3, DP6, DP7, DP8 and DP9
Red	DP0 (Safety) is red OR 2 other DPs are red
Amber	All other colour combinations not covered by Red or Green
Green	2 DPs are green and 0 are red OR 3 DPs are green and 1 is red

Table 9 - AMS Assessment Criteria

3.4.3 The criteria in Table 10 describe how each option's overall combination of reds/ambers/greens lead to the option progressing to the next step or to rejection and discounting from further development.

DP Priority	Criteria for Rejection Status
A	1 red OR 1 amber
B	2 reds
C	2 reds

Table 10 - Accept / Reject Criteria

3.4.4 Each design option has been assessed against the Design Principles. The following code is used for each design option. Airport (e.g. KB) - Structure Type (e.g. Inner Hold: IH/Point Merge: PM) - Location (e.g. Northeast: NE). DN = Do Nothing. DM = Do Minimum.

DP	Priority	KB - DN (Shared)	KB - IH - NE	KB - IH - E
RESULT		REJECT	ACCEPT	ACCEPT
DP0 Safety	A AMS	Maintained: Similar operation to today	Maintained: Holds are used elsewhere in current day operations and are known to be safe	Maintained: Holds are used elsewhere in current day operations and are known to be safe
DP1 Operational (Delay Absorption)	B AMS	Today's operation, no change from baseline	Would maintain a similar number of holding levels, therefore similar level of delay absorption	Would maintain a similar number of holding levels, therefore similar level of delay absorption
DP1 Operational (Disruption Recovery)	B AMS	Today's operation, no change from baseline	Holds closer to the runway allow a quicker recovery following disruption	Holds closer to the runway allow a quicker recovery following disruption
DP2 Economic (Fuel)	B	Today's operation, no change from baseline	Improved performance due to aircraft having reduced track miles by not operating today's PM structure	Improved fuel performance due to aircraft having reduced track miles by not operating today's PM structure
DP3 Environmental (CO ₂)	B AMS	Today's operation, no change from baseline	CO ₂ emissions per flight improved due to aircraft having reduced track miles by not operating today's PM structure	CO ₂ emissions per flight improved due to aircraft having reduced track miles by not operating today's PM structure
DP4 Environmental (Noise)	C	Today's operation, no change from baseline	Impact on routes (and noise distribution) below 7,000ft not known at this point	Impact on routes (and noise distribution) below 7,000ft not known at this point
DP5 Technical (CAS)	C	Today's operation, no change from baseline	Design likely to be within current day CAS; ability to return CAS will be assessed in Stage 3	Design likely to be within current day CAS; ability to return CAS will be assessed in Stage 3
DP6 Technical (Other Users)	C AMS	Today's operation, no change from baseline	Likely to be in current day CAS, no anticipated change in impacts	Likely to be in current day CAS, no anticipated change in impacts
DP7 Technical (MoD)	C AMS	Operation is known not to impact MoD currently, therefore no change in impact	Assumes design would not impact Shoeburyness DA Complex. Therefore, no negative impact on current MoD operations	Assumes design would not impact Shoeburyness DA Complex. Therefore, no negative impact on current MoD operations
DP8 Operational (Capacity)	B AMS	Aligns with network traffic flows. As a shared facility would support airport arrival loading for Biggin Hill or London City, not both.	Supports the required airport arrival loading, however, negatively impacts capacity of eastbound network traffic flows	Supports the required airport arrival loading, however, negatively impacts capacity of eastbound network traffic flows
DP8 Operational (Efficiency)	B AMS	Today's operation, no change in ATCO workload anticipated	An independent facility could reduce Approach ATCO workload. A hold structure may be less systemised than baseline and increase TMA ATCO workload. Net neutral	An independent facility could reduce Approach ATCO workload. A hold structure may be less systemised than baseline and increase TMA ATCO workload. Net neutral
DP9 Technical (Route Spacing)	B AMS	Does not fully utilise the performance capabilities of modern aircraft	Structure will be designed, in collaboration with the airport, to the highest appropriate PBN standard enabling efficient spacing between routes	Structure will be designed, in collaboration with the airport, to the highest appropriate PBN standard enabling efficient spacing between routes
DP10 Policy (AMS)	A	Green: DP0, DP7 Amber: DP1, DP1, DP3, DP6, DP8, DP8 Red: DP9	Green: DP0, DP1, DP3, DP7, DP8, DP9 Amber: DP1, DP6, DP8 Red: None	Green: DP0, DP1, DP3, DP7, DP9 Amber: DP1, DP6, DP8, DP8 Red: None

DP	Priority	KB - IH - SE	KB - IH - SW (Shared)	KB - IH - W (Shared)
RESULT		ACCEPT	ACCEPT	ACCEPT
DP0 Safety	A AMS	Maintained: Holds are used elsewhere in current day operations and are known to be safe	Maintained: Holds are used elsewhere in current day operations and are known to be safe	Maintained: Holds are used elsewhere in current day operations and are known to be safe
DP1 Operational (Delay Absorption)	B AMS	Would maintain a similar number of holding levels, therefore similar level of delay absorption	Would maintain a similar number of holding levels, therefore similar level of delay absorption	Would maintain a similar number of holding levels, therefore similar level of delay absorption
DP1 Operational (Disruption Recovery)	B AMS	Holds closer to the runway allow a quicker recovery following disruption	Holds closer to the runway allow a quicker recovery following disruption	Holds closer to the runway allow a quicker recovery following disruption
DP2 Economic (Fuel)	B	Improved fuel performance due to aircraft having reduced track miles by not operating today's PM structure	Improved fuel performance due to aircraft having reduced track miles for traffic from west	Improved fuel performance due to aircraft having reduced track miles for traffic from west
DP3 Environmental (CO ₂)	B AMS	CO ₂ emissions per flight improved due to aircraft having reduced track miles by not operating today's PM structure	CO ₂ emissions per flight improved due to aircraft having reduced track miles by not operating today's PM structure	CO ₂ emissions per flight improved due to aircraft having reduced track miles by not operating today's PM structure
DP4 Environmental (Noise)	C	Impact on routes (and noise distribution) below 7,000ft not known at this point	Impact on routes (and noise distribution) below 7,000ft not known at this point	Impact on routes (and noise distribution) below 7,000ft not known at this point
DP5 Technical (CAS)	C	Design likely to be within current day CAS; ability to return CAS will be assessed in Stage 3	Design likely to be within current day CAS; ability to return CAS will be assessed in Stage 3	Design likely to be within current day CAS; ability to return CAS will be assessed in Stage 3
DP6 Technical (Other Users)	C AMS	Likely to be in current day CAS, no anticipated change in impacts	Likely to be in current day CAS, no anticipated change in impacts	Likely to be in current day CAS, no anticipated change in impacts
DP7 Technical (MoD)	C AMS	No military-use areas in the vicinity, therefore, would not require a change to MoD operations	No military-use areas in the vicinity, therefore, would not require a change to MoD operations	No military-use areas in the vicinity, therefore, would not require a change to MoD operations
DP8 Operational (Capacity)	B AMS	Aligns with network traffic flows and concept can support the airport required arrival loading	Aligns with network traffic flows and concept can support the airport required arrival loading	Aligns with network traffic flows and concept can support the airport required arrival loading
DP8 Operational (Efficiency)	B AMS	An independent facility could reduce Approach ATCO workload. A hold structure may be less systemised than baseline and increase TMA ATCO workload. Net neutral	Current day is a shared facility; however, a different location would involve multiple sectors. Net increase in workload	Current day is a shared facility; however, a different location would involve multiple sectors. Net increase in workload
DP9 Technical (Route Spacing)	B AMS	Structure will be designed, in collaboration with the airport, to the highest appropriate PBN standard enabling efficient spacing between routes	Structure will be designed, in collaboration with the airport, to the highest appropriate PBN standard enabling efficient spacing between routes	Structure will be designed, in collaboration with the airport, to the highest appropriate PBN standard enabling efficient spacing between routes
DP10 Policy (AMS)	A	Green: DP0, DP1, DP3, DP7, DP8, DP9 Amber: DP1, DP6, DP8 Red: None	Green: DP0, DP1, DP3, DP7, DP8, DP9 Amber: DP1, DP6 Red: DP8	Green: DP0, DP1, DP3, DP7, DP8, DP9 Amber: DP1, DP6 Red: DP8

DP	Priority	KB - IH - OH	KB - PM - NE (Maybe shared)	KB - PM - E (DM) (Maybe shared)
RESULT		REJECT	ACCEPT	ACCEPT
DP0 Safety	A AMS	Maintained: Holds are used elsewhere in current day operations and are known to be safe	Maintained: PM are used in current day operations and are known to be safe	Maintained: PM are used in current day operations and are known to be safe
DP1 Operational (Delay Absorption)	B AMS	Would maintain a similar number of holding levels, therefore similar level of delay absorption	Optimised PM and associated holds would provide increased levels of delay absorption	Optimised PM and associated holds would provide increased levels of delay absorption
DP1 Operational (Disruption Recovery)	B AMS	Holds closer to the runway allow a quicker recovery following disruption	Assumed contingency hold within the transition, net disruption recovery similar to today	Assumed contingency hold within the transition, net disruption recovery similar to today
DP2 Economic (Fuel)	B	Fuel performance worsened as aircraft route overhead then track away to lose height on descent, increasing track miles	Optimised concept, partially aligned with airport traffic flows, therefore fuel performance neutral	Optimised concept aligned with airport traffic flows, therefore improved fuel performance
DP3 Environmental (CO ₂)	B AMS	CO ₂ emissions worsened as aircraft route overhead then track away to lose height on descent, increasing track miles	Optimised concept, partially aligned with airport traffic flows, therefore CO ₂ emissions neutral	Optimised concept of current day operation aligned with airport traffic flows, therefore CO ₂ emissions per flight improved
DP4 Environmental (Noise)	C	Impact on routes (and noise distribution) below 7,000ft not known at this point	Impact on routes (and noise distribution) below 7,000ft not known at this point	Impact on routes (and noise distribution) below 7,000ft not known at this point
DP5 Technical (CAS)	C	Design likely to be within current day CAS; ability to return CAS will be assessed in Stage 3	Design likely to be within current day CAS; ability to return CAS will be assessed in Stage 3	Design likely to be within current day CAS; ability to return CAS will be assessed in Stage 3
DP6 Technical (Other Users)	C AMS	Likely to be in current day CAS, no anticipated change in impacts	Likely to be in current day CAS, no anticipated change in impacts	Likely to be in current day CAS, no anticipated change in impacts
DP7 Technical (MoD)	C AMS	No military-use areas in the vicinity, therefore, would not require a change to MoD operations	Assumes design would not impact Shoeburyness DA Complex. Therefore, no negative impact on current MoD operations	Assumes design would not impact Shoeburyness DA Complex. Therefore, no negative impact on current MoD operations
DP8 Operational (Capacity)	B AMS	Supports the required airport arrival loading, however, negatively impacts capacity of eastbound network traffic flows	Supports the required airport arrival loading, however, negatively impacts capacity of network traffic flows	Aligns with network traffic flows and concept can support the airport required arrival loading
DP8 Operational (Efficiency)	B AMS	An independent facility could reduce workload. Location could negatively impact adjacent traffic flows. Net ATCO workload increased	Similar concept to today's operation, therefore no change in ATCO workload anticipated	Similar concept to today's operation, therefore no change in ATCO workload anticipated
DP9 Technical (Route Spacing)	B AMS	Structure will be designed, in collaboration with the airport, to the highest appropriate PBN standard enabling efficient spacing between routes	Structure will be designed, in collaboration with the airport, to the highest appropriate PBN standard enabling efficient spacing between routes	Structure will be designed, in collaboration with the airport, to the highest appropriate PBN standard enabling efficient spacing between routes
DP10 Policy (AMS)	A	Green: DP0, DP1, DP7, DP9 Amber: DP1, DP6, DP8 Red: DP3, DP8	Green: DP0, DP1, DP7, DP8, DP9 Amber: DP1, DP3, DP6, DP8 Red: None	Green: DP0, DP1, DP3 DP7, DP8, DP9 Amber: DP1, DP6, DP8 Red: None

Table 11 Design Principle Evaluation

3.4.5 'Do Nothing' and 1 design option were assessed as not meeting the DPs and were rejected at this stage. The remaining 7 viable design options progress to Step 2B Options Appraisal.

3.5 Initial Options Appraisal

3.5.1 The following viable options have been progressed to IOA:

Biggin Hill Design Options progressed to IOA
Inner Holds - Northeast
Inner Holds - East
Inner Holds – Southeast
Inner Holds – Southwest (Shared)
Inner Holds – West (Shared)
Point Merge – Northeast (Maybe shared)
Point Merge – East (DM)

Table 12 Summary of design options progressed from DPE to IOA

Table 13 shows the assessment criteria used to complete the initial appraisal of each shortlisted option.

Group	Impact
Communities	Noise impact on health and quality of life
	A qualitative assessment of changes to noise impacts compared with the 'Do Nothing' baseline.
	A qualitative assessment of changes to tranquillity impacts compared with the 'Do Nothing' baseline.
Communities	Air Quality
	A qualitative assessment of changes to local air quality compared with the 'Do Nothing' baseline.
Wider Society	Greenhouse Gas Impacts
	A qualitative assessment of changes to greenhouse gas impacts compared with the 'Do Nothing' baseline.
Wider Society	Capacity / Resilience
	A qualitative assessment of changes to airspace capacity and resilience compared with the 'Do Nothing' baseline.
General Aviation (GA)	Access
	A qualitative assessment of changes to GA access compared with the 'Do Nothing' baseline.
GA/Commercial Airlines	Economic Impact from Increased Effective Capacity
	A qualitative assessment of changes to GA and commercial operator economic impacts from increased effective capacity compared with the 'Do Nothing' baseline.
GA/Commercial Airlines	Fuel Burn
	A qualitative assessment of changes to GA and commercial operator fuel burn impacts compared with the 'Do Nothing' baseline.
Commercial Airlines	Training Costs
	A qualitative assessment of changes to commercial operator training costs compared with the 'Do Nothing' baseline.
Commercial Airlines	Other Costs
	A qualitative assessment of changes to other relevant commercial operator costs compared with the 'Do Nothing' baseline.
Airport / ANSP	Infrastructure Costs
	A qualitative assessment of changes to airport and ANSP infrastructure costs compared with the 'Do Nothing' baseline.
Airport / ANSP	Operational Costs
	A qualitative assessment of changes to airport and ANSP operational costs compared with the 'Do Nothing' baseline.
Airport / ANSP	Deployment Costs
	A qualitative assessment of changes to airport and ANSP deployment costs compared with the 'Do Nothing' baseline.
All	Performance against the vision and parameters/strategic objectives of the AMS
	A qualitative assessment of how the design option performs, considering the AMS objectives of improved capacity, reduced CO ₂ , minimal impact on other users, maintaining or enhancing safety, and facilitation of defence and security objectives, compared with the 'Do Nothing' baseline.

Table 13 Initial Options Appraisal Assessment Criteria

3.5.2 The baseline 'Do Nothing' is described in Section 2. It did not progress through the DPE however, in line with CAP1616, it must be included in the IOA for comparison purposes. Each option is described in Section 3.3 and Section 5 Appendix 1.

KB – DN (Shared) Qualitative Initial Impacts Assessment		REJECTED
Group	Impact	
Communities	Noise impact on health and quality of life	
	ANG (2017) states “at or above 7,000ft...minimising of noise is no longer a priority”. CAP1616 instructs sponsors to consider noise and tranquillity impacts where the proposal has the potential to change overflight of inhabited areas, AONBs and NPs below 7,000ft. No change in airspace design – no changes to impacts.	
Communities	Air Quality	
	ANG (2017) states “emissions from aircraft above 1,000ft are unlikely to have a significant impact on local air quality”. No change in airspace design – no changes to impacts.	
Wider Society	Greenhouse Gas Impacts	
	In the short term, there would be no change. In the long term, failure to modernise the airspace would have a negative impact on GHG emissions due to increased likelihood of delays/holding in an unchanged design as traffic is forecast to increase.	
Wider Society	Capacity / Resilience	
	In the short term, there would be no change. In the long term, failure to modernise the airspace would have a negative impact on capacity and resilience due to increased likelihood of delays/holding in an unchanged design as traffic is forecast to increase.	
General Aviation (GA)	Access	
	In the short term, there would be no change in impact. In the long term, failure to modernise the airspace would lead to increased likelihood of commercial aircraft delays and holding in an unchanged design as traffic is forecast to increase. This may lead to negative impacts on GA access due to the busier airspace, however as GA access is currently relatively infrequent at network levels, this may not be a major impact.	
GA/Commercial Airlines	Economic Impact from Increased Effective Capacity	
	In the short term, there would be no change in impact. In the long term, failure to modernise the airspace would have a negative impact on capacity due to increased likelihood of delays/holding in an unchanged design as traffic is forecast to increase. This would lead to a negative economic impact.	
GA/Commercial Airlines	Fuel Burn	
	In the short term, there would be no change in impact. In the long term, failure to modernise the airspace would have a negative impact on fuel burn due to increased likelihood of delays/holding in an unchanged design as traffic is forecast to increase.	
Commercial Airlines	Training Costs	
	Flight procedures change worldwide with each AIRAC cycle and operators would update their procedures accordingly, training staff if required. If this baseline system was retained, the same flight procedures would be used, and training cost impacts would not change.	
Commercial Airlines	Other Costs	
	No change in airspace design – no changes to other commercial operator costs.	
Airport / ANSP	Infrastructure Costs	
	No change in airspace design – no changes to infrastructure costs. If this baseline system was retained, the same infrastructure would continue to be used in the same way, with no additional costs.	
Airport / ANSP	Operational Costs	
	No change in airspace design – no changes to infrastructure costs. If this baseline system was retained, the same infrastructure would continue to be used in the same way, with no additional operational costs.	
Airport / ANSP	Deployment Costs	
	If this baseline system was retained, there would be no deployment, hence no associated costs.	
AMS	Performance against the vision and parameters/strategic objectives of the AMS	
	<ul style="list-style-type: none"> • Safety: maintained • Simplification: worsens delay absorption, disruption recovery, airport capacity, network capacity and ATCO workload. Does not utilise aircraft performance capabilities • Integration of diverse users: continues to integrate defence and security and GA • Environmental sustainability: worsens CO₂ emissions 	
Qualitative Safety Assessment		
	A high-level safety appraisal for this proposed option indicates that if the baseline system was retained, the existing level of safety performance undertaken within the current operation would be at least maintained. However, if there was no change to the current operation the potential increase in traffic as forecast would increase controller workload and traffic complexity within the LTMA leading to potential safety issues in the future. In order to mitigate any reduction in safety margins it is likely that increased flow management measures would be required, resulting in additional delay.	
Conclusion from IOA		
	This option was rejected during the DPE stage. It has been included for comparison purposes only.	

Table 14 KB-DN Initial Options Appraisal

KB - IH - NE Qualitative Initial Impacts Assessment		PROCESSED
Group	Impact	
Communities	Noise impact on health and quality of life	
	ANG (2017) states “at or above 7,000ft...minimising of noise is no longer a priority”. CAP1616 instructs sponsors to consider noise and tranquillity impacts where the proposal has the potential to change overflight of inhabited areas, AONBs and NPs below 7,000ft. In this network-level proposal, changes would not occur below 7,000ft therefore these impacts are not considered.”	
Communities	Air Quality	
	ANG (2017) states “emissions from aircraft above 1,000ft are unlikely to have a significant impact on local air quality”. Changes would occur at or above 7,000ft, thus in accordance with ANG (2017) there would be no change in local air quality impacts.	
Wider Society	Greenhouse Gas Impacts	
	This design option could provide shorter arrival routes compared with today’s PM structure. An independent arrival structure could reduce the likelihood of delays due to no longer sharing a facility with London City’s arrival traffic. Therefore, it could reduce GHG emissions for each flight compared with the baseline.	
Wider Society	Capacity / Resilience	
	Capacity: An independent arrival structure could enable increased airport capacity due to no longer sharing a facility with London City’s arrival traffic. Also, as traffic levels increase, this capacity improvement could reduce the frequency of delays/holding compared with the baseline. However, this location does not align with network traffic flows. Overall, this option could improve airport capacity but hinder the network capacity, compared with the baseline. Other non-airspace constraints may hinder overall capacity gains at Biggin Hill. Resilience: An independent arrival structure could remove the negative impact of an unplanned runway closure at London City on Biggin Hill. A hold closer to the runway could also allow a quicker recovery following disruption than the baseline. Furthermore, this option could maintain a similar number of holding levels, therefore it could maintain delay absorption compared with the baseline.	
General Aviation (GA)	Access	
	An independent arrival facility to the northeast would likely be within current day CAS. As a result, the access impact on GA traffic is unlikely to change compared with the baseline.	
GA/Commercial Airlines	Economic Impact from Increased Effective Capacity	
	This option could enable airport capacity which could result in an economic benefit over the baseline for commercial traffic. However, other non-airspace constraints may hinder capacity and economic gains at Biggin Hill. An independent facility could create network inefficiencies over the current baseline (shared facility). This is due to the extended track distance or inefficient profiles required by the network traffic, to deconflict from the additional arrival structure, resulting in increased fuel burn. This could have a negative economic impact on other LTMA traffic – commercial and GA.	
GA/Commercial Airlines	Fuel Burn	
	This design option could provide shorter arrival routes compared with today’s PM structure. An independent arrival structure could reduce the likelihood of delays due to no longer sharing a facility with London City’s arrival traffic. Therefore, it could reduce fuel burn for each airport arrival flight compared with the baseline for commercial traffic. An independent facility could create network inefficiencies over the current baseline (shared facility). This is due to the extended track distance or inefficient profiles required by the network traffic, to deconflict from the additional arrival structure, resulting in increased fuel burn. This could have a negative impact on all LTMA traffic – commercial and GA.	
Commercial Airlines	Training Costs	
	Flight procedures change worldwide with each AIRAC cycle and operators would update their procedures accordingly, training staff if required. This option is not anticipated to impose additional training cost impacts for operators.	
Commercial Airlines	Other Costs	
	No other operator costs are foreseen.	
Airport / ANSP	Infrastructure Costs	
	This design option is not expected to change airport or ANSP infrastructure impacts, beyond the initial deployment phase which will require some systems engineering adaptations.	
Airport / ANSP	Operational Costs	
	This design option is not expected to change airport or ANSP operational cost impacts.	
Airport / ANSP	Deployment Costs	
	At this stage it is disproportionate to attempt to quantify deployment costs per design option. However, a large LTMA system change would involve training a large number of controllers and assistants via the use of various air traffic simulators (including sim prep, management, and staffing), with additional system engineering costs.	

AMS	Performance against the vision and parameters/strategic objectives of the AMS
	<ul style="list-style-type: none"> • Safety: maintained • Simplification: could improve disruption recovery, enable airport capacity, maintain delay absorption, maintain ATCO workload and worsen network capacity. Will utilise aircraft performance capabilities • Integration of diverse users: continues to integrate defence and security and GA, subject to constraints of the design • Environmental sustainability: could reduce CO₂ emissions. Could result in network inefficiencies
Qualitative Safety Assessment	
A high-level safety appraisal for this proposed option indicates that an Inner Hold to the northeast would at least maintain current safety performance. There are multiple holds within current UK airspace which have a proven safety performance. An arrival structure in this location would need to deconflict with Heathrow arrivals, all London City traffic and Stansted departures.	
Conclusion from IOA	
Compared to the baseline, this option could improve disruption recovery, fuel burn, CO ₂ emissions, and enable airport capacity. It would maintain safety and maintain any current MoD access. However, the negative impacts on network capacity and transiting GA traffic may be worse than the baseline. Therefore, KB – IH – NE is progressed to Stage 3 for further development.	

Table 15 KB-IH-NE Initial Options Appraisal

KB - IH - E Qualitative Initial Impacts Assessment		PROGRESSED
Group	Impact	
Communities	Noise impact on health and quality of life	
	ANG (2017) states “at or above 7,000ft...minimising of noise is no longer a priority”. CAP1616 instructs sponsors to consider noise and tranquillity impacts where the proposal has the potential to change overflight of inhabited areas, AONBs and NPs below 7,000ft. In this network-level proposal, changes would not occur below 7,000ft therefore these impacts are not considered.	
Communities	Air Quality	
	ANG (2017) states “emissions from aircraft above 1,000ft are unlikely to have a significant impact on local air quality”. Changes would occur at or above 7,000ft, thus in accordance with ANG (2017) there would be no change in local air quality impacts.	
Wider Society	Greenhouse Gas Impacts	
	This design option could provide shorter arrival routes compared with today’s PM structure. An independent arrival structure could reduce the likelihood of delays due to no longer sharing a facility with London City’s arrival traffic. Therefore, it could reduce GHG emissions for each flight compared with the baseline.	
Wider Society	Capacity / Resilience	
	Capacity: An independent arrival structure could enable increased airport capacity due to no longer sharing a facility with London City’s arrival traffic. Also, as traffic levels increase, this capacity improvement could reduce the frequency of delays/holding compared with the baseline. However, this location does not align with network traffic flows. Overall, this option could improve airport capacity but hinder the network capacity, compared with the baseline. Other non-airspace constraints may hinder overall capacity gains at Biggin Hill. Resilience: An independent arrival structure could remove the negative impact of an unplanned runway closure at London City on Biggin Hill. A hold closer to the runway could also allow a quicker recovery following disruption than the baseline. Furthermore, this option could maintain a similar number of holding levels, therefore it could maintain delay absorption compared with the baseline.	
General Aviation (GA)	Access	
	An independent arrival facility to the east would likely be within current day CAS. As a result, the access impact on GA traffic is unlikely to change compared with the baseline.	
GA/Commercial Airlines	Economic Impact from Increased Effective Capacity	
	This option could enable airport capacity which could result in an economic benefit over the baseline for commercial traffic. However, other non-airspace constraints may hinder capacity and economic gains at Biggin Hill. An independent facility could create network inefficiencies over the current baseline (shared facility). This is due to the extended track distance or inefficient profiles required by the network traffic, to deconflict from the additional arrival structure, resulting in increased fuel burn. This could have a negative economic impact on other LTMA traffic – commercial and GA.	
GA/Commercial Airlines	Fuel Burn	
	This design option could provide shorter arrival routes compared with today’s PM structure. An independent arrival structure could reduce the likelihood of delays due to no longer sharing a facility with London City’s arrival traffic. Therefore, it could reduce fuel burn for each airport arrival flight compared with the baseline for commercial traffic. An independent facility could create network inefficiencies over the current baseline (shared facility). This is due to the extended track distance or inefficient profiles required by the network traffic, to deconflict from the additional arrival structure, resulting in increased fuel burn. This could have a negative impact on all LTMA traffic – commercial and GA.	
Commercial Airlines	Training Costs	
	Flight procedures change worldwide with each AIRAC cycle and operators would update their procedures accordingly, training staff if required. This option is not anticipated to impose additional training cost impacts for operators.	
Commercial Airlines	Other Costs	
	No other operator costs are foreseen.	
Airport / ANSP	Infrastructure Costs	
	This design option is not expected to change airport or ANSP infrastructure impacts, beyond the initial deployment phase which will require some systems engineering adaptations.	
Airport / ANSP	Operational Costs	
	This design option is not expected to change airport or ANSP operational cost impacts.	
Airport / ANSP	Deployment Costs	
	At this stage it is disproportionate to attempt to quantify deployment costs per design option. However, a large LTMA system change would involve training a large number of controllers and assistants via the use of various air traffic simulators (including sim prep, management, and staffing), with additional system engineering costs.	

AMS	Performance against the vision and parameters/strategic objectives of the AMS
	<ul style="list-style-type: none"> • Safety: maintained • Simplification: could improve disruption recovery and enables airport capacity, maintain delay absorption and maintain ATCO workload. Could worsen network capacity. Will utilise aircraft performance capabilities • Integration of diverse users: continues to integrate defence and security and GA, subject to constraints of the design • Environmental sustainability: could reduce CO₂ emissions. Could result in network inefficiencies
Qualitative Safety Assessment	
A high-level safety appraisal for this proposed option indicates that an Inner Hold to the east would at least maintain current safety performance. There are multiple holds within current UK airspace which have a proven safety performance. An arrival structure in this location would need to deconflict with Heathrow and Southend departures and all London City traffic.	
Conclusion from IOA	
Compared to the baseline, this option could improve disruption recovery, fuel burn, CO ₂ emissions, and enable airport capacity. It would maintain safety and any current MoD access. It could maintain delay absorption. However, the negative impact on network capacity and transiting GA traffic may be worse than the baseline. Therefore, KB – IH – E is progressed to Stage 3 for further development.	

Table 16 KB-IH-E Initial Options Appraisal

KB - IH - SE Qualitative Initial Impacts Assessment		PROGRESSED
Group	Impact	
Communities	Noise impact on health and quality of life	
	ANG (2017) states “at or above 7,000ft...minimising of noise is no longer a priority”. CAP1616 instructs sponsors to consider noise and tranquillity impacts where the proposal has the potential to change overflight of inhabited areas, AONBs and NPs below 7,000ft. In this network-level proposal, changes would not occur below 7,000ft therefore these impacts are not considered.	
Communities	Air Quality	
	ANG (2017) states “emissions from aircraft above 1,000ft are unlikely to have a significant impact on local air quality”. Changes would occur at or above 7,000ft, thus in accordance with ANG (2017) there would be no change in local air quality impacts.	
Wider Society	Greenhouse Gas Impacts	
	This design option could provide shorter arrival routes compared with today’s PM structure. An independent arrival structure could reduce the likelihood of delays due to no longer sharing a facility with London City’s arrival traffic. Therefore, it could reduce GHG emissions for each flight compared with the baseline.	
Wider Society	Capacity / Resilience	
	Capacity: An independent arrival structure could enable increased airport capacity due to no longer sharing a facility with London City’s arrival traffic. Also, as traffic levels increase, this capacity improvement could reduce the frequency of delays/holding compared with the baseline. This location aligns with network traffic flows. Overall, this option could improve airport capacity and maintain network capacity compared with the baseline. Other non-airspace constraints may hinder overall capacity gains at Biggin Hill. Resilience: An independent arrival structure could remove the negative impact of an unplanned runway closure at London City on Biggin Hill. A hold closer to the runway could also allow a quicker recovery following disruption than the baseline. Furthermore, this option could maintain a similar number of holding levels, therefore it could maintain delay absorption compared with the baseline.	
General Aviation (GA)	Access	
	An independent arrival facility to the southeast would likely be within current day CAS. As a result, the access impact on GA traffic is unlikely to change compared with the baseline.	
GA/Commercial Airlines	Economic Impact from Increased Effective Capacity	
	This option could enable airport capacity which could result in an economic benefit over the baseline for commercial traffic. However, other non-airspace constraints may hinder capacity and economic gains at Biggin Hill. An independent facility could create network inefficiencies over the current baseline (shared facility). This is due to the extended track distance or inefficient profiles required by the network traffic, to deconflict from the additional arrival structure, resulting in increased fuel burn. This could have a negative economic impact on other LTMA traffic – commercial and GA.	
GA/Commercial Airlines	Fuel Burn	
	This design option could provide shorter arrival routes compared with today’s PM structure. An independent arrival structure could reduce the likelihood of delays due to no longer sharing a facility with London City’s arrival traffic. Therefore, it could reduce fuel burn for each airport arrival flight compared with the baseline for commercial traffic. An independent facility could create network inefficiencies over the current baseline (shared facility). This is due to the extended track distance or inefficient profiles required by the network traffic, to deconflict from the additional arrival structure, resulting in increased fuel burn. This could have a negative impact on all LTMA traffic – commercial and GA.	
Commercial Airlines	Training Costs	
	Flight procedures change worldwide with each AIRAC cycle and operators would update their procedures accordingly, training staff if required. This option is not anticipated to impose additional training cost impacts for operators.	
Commercial Airlines	Other Costs	
	No other operator costs are foreseen.	
Airport / ANSP	Infrastructure Costs	
	This design option is not expected to change airport or ANSP infrastructure impacts, beyond the initial deployment phase which will require some systems engineering adaptations.	
Airport / ANSP	Operational Costs	
	This design option is not expected to change airport or ANSP operational cost impacts.	
Airport / ANSP	Deployment Costs	
	At this stage it is disproportionate to attempt to quantify deployment costs per design option. However, a large LTMA system change would involve training a large number of controllers and assistants via the use of various air traffic simulators (including sim prep, management, and staffing), with additional system engineering costs.	

AMS	Performance against the vision and parameters/strategic objectives of the AMS
	<ul style="list-style-type: none"> • Safety: maintained • Simplification: could improve disruption recovery and enables airport capacity, maintain delay absorption, maintain ATCO workload, and maintain network capacity. Will utilise aircraft performance capabilities • Integration of diverse users: continues to integrate defence and security and GA, subject to constraints of the design • Environmental sustainability: could reduce CO₂ emissions. Could result in network inefficiencies
Qualitative Safety Assessment	
A high-level safety appraisal for this proposed option indicates that an Inner Hold to the southeast would at least maintain current safety performance. There are multiple holds within current UK airspace which have a proven safety performance. An arrival structure in this location would need to deconflict with Gatwick, Heathrow and London City departures.	
Conclusion from IOA	
Compared to the baseline, this option could improve disruption recovery, fuel burn, CO ₂ emissions, and enable airport capacity. It would maintain safety and any current MoD access; it could maintain delay absorption, and network capacity. However, the negative impact on transiting GA traffic may be worse than the baseline. Therefore, KB – IH – SE is progressed to Stage 3 for further development.	

Table 17 KB-IH-SE Initial Options Appraisal

KB - IH – SW (Shared) Qualitative Initial Impacts Assessment		PROGRESSED
Group	Impact	
Communities	Noise impact on health and quality of life	
	ANG (2017) states “at or above 7,000ft...minimising of noise is no longer a priority”. CAP1616 instructs sponsors to consider noise and tranquillity impacts where the proposal has the potential to change overflight of inhabited areas, AONBs and NPs below 7,000ft. In this network-level proposal, changes would not occur below 7,000ft therefore these impacts are not considered.	
Communities	Air Quality	
	ANG (2017) states “emissions from aircraft above 1,000ft are unlikely to have a significant impact on local air quality”. Changes would occur at or above 7,000ft, thus in accordance with ANG (2017) there would be no change in local air quality impacts.	
Wider Society	Greenhouse Gas Impacts	
	This design option could provide shorter arrival routes compared with today’s PM structure. This facility would be provided alongside another facility to the east, therefore, providing additional (shorter) arrival routes for traffic from the west. This could reduce GHG emissions for each flight compared with the baseline.	
Wider Society	Capacity / Resilience	
	Capacity: This option would be implemented alongside another holding facility in a different location. This facility provides increased airport capacity for traffic arriving from the west and could release capacity in the eastern facility. This location also aligns with network traffic flows. Overall, this option could improve airport capacity and maintain network capacity compared with the baseline. Other non-airspace constraints may hinder overall capacity gains at Biggin Hill. Resilience: A hold closer to the runway could allow a quicker recovery following disruption than the baseline. Furthermore, this option could maintain a similar number of holding levels, therefore it could maintain delay absorption compared with the baseline.	
General Aviation (GA)	Access	
	An arrival facility to the southwest would likely be within current day CAS. As a result, the access impact on GA traffic is unlikely to change compared with the baseline.	
GA/Commercial Airlines	Economic Impact from Increased Effective Capacity	
	This option could enable airport capacity which could result in an economic benefit over the baseline for commercial traffic. However, other non-airspace constraints may hinder capacity and economic gains at Biggin Hill. No impact on GA is expected.	
GA/Commercial Airlines	Fuel Burn	
	This design option could provide shorter arrival routes for traffic from the west compared with today’s PM structure. This facility would be provided alongside another facility to the east/southeast, therefore, providing additional (shorter) arrival routes for traffic from the west. This could reduce fuel burn for each flight compared with the baseline for commercial traffic. There are currently structures in this location (for other LTMA airfields) so no change in impact is expected for GA traffic.	
Commercial Airlines	Training Costs	
	Flight procedures change worldwide with each AIRAC cycle and operators would update their procedures accordingly, training staff if required. This option is not anticipated to impose additional training cost impacts for operators.	
Commercial Airlines	Other Costs	
	No other operator costs are foreseen.	
Airport / ANSP	Infrastructure Costs	
	This design option is not expected to change airport or ANSP infrastructure impacts, beyond the initial deployment phase which will require some systems engineering adaptations.	
Airport / ANSP	Operational Costs	
	This design option is not expected to change airport or ANSP operational cost impacts.	
Airport / ANSP	Deployment Costs	
	At this stage it is disproportionate to attempt to quantify deployment costs per design option. However, a large LTMA system change would involve training a large number of controllers and assistants via the use of various air traffic simulators (including sim prep, management, and staffing), with additional system engineering costs.	

AMS	Performance against the vision and parameters/strategic objectives of the AMS
	<ul style="list-style-type: none"> • Safety: maintained • Simplification: could improve disruption recovery and enable airport capacity, maintain delay absorption and maintain network capacity. Could worsen ATCO workload. Will utilise aircraft performance capabilities • Integration of diverse users: continues to integrate defence and security and GA, subject to constraints of the design • Environmental sustainability: could reduce CO₂ emissions
Qualitative Safety Assessment	
A high-level safety appraisal for this proposed option indicates that a shared Inner Hold to the southwest would at least maintain current safety performance. There are multiple holds within current UK airspace which have a proven safety performance. This option would increase complexity due to multiple ATCOs being required to coordinate Biggin Hill arrivals from both the east and west. An arrival structure in this location would need to deconflict with Gatwick arrivals and Heathrow departures.	
Conclusion from IOA	
Compared to the baseline, this option could improve disruption recovery, fuel burn, CO ₂ emissions, and enable airport capacity. It would maintain safety and any current MoD access; it could maintain delay absorption, access for other users, and network capacity. However, it could increase ATCO workload. Therefore, KB – IH – SW (Shared) is progressed to Stage 3 for further development.	

Table 18 KB-IH-SW(Shared) Initial Options Appraisal

KB - IH – W (Shared) Qualitative Initial Impacts Assessment		PROGRESSED
Group	Impact	
Communities	Noise impact on health and quality of life	
	ANG (2017) states “at or above 7,000ft...minimising of noise is no longer a priority”. CAP1616 instructs sponsors to consider noise and tranquillity impacts where the proposal has the potential to change overflight of inhabited areas, AONBs and NPs below 7,000ft. In this network-level proposal, changes would not occur below 7,000ft therefore these impacts are not considered.	
Communities	Air Quality	
	ANG (2017) states “emissions from aircraft above 1,000ft are unlikely to have a significant impact on local air quality”. Changes would occur at or above 7,000ft, thus in accordance with ANG (2017) there would be no change in local air quality impacts.	
Wider Society	Greenhouse Gas Impacts	
	This design option could provide shorter arrival routes compared with today’s PM structure. This facility could be provided alongside another facility to the east, therefore, providing additional (shorter) arrival routes for traffic from the west. This could reduce GHG emissions for each flight compared with the baseline.	
Wider Society	Capacity / Resilience	
	Capacity: As this option would be implemented alongside another facility to the east/southeast. There could be increased airport capacity for traffic arriving from the west and released capacity in the eastern facility. This location also aligns with network traffic flows. Overall, this option could improve airport capacity and maintain network capacity compared with the baseline. Other non-airspace constraints may hinder overall capacity gains at Biggin Hill. Resilience: A hold closer to the runway could allow a quicker recovery following disruption than the baseline. Furthermore, this option could maintain a similar number of holding levels, therefore it could maintain delay absorption compared with the baseline.	
General Aviation (GA)	Access	
	An arrival facility to the west would likely be within current day CAS. As a result, the access impact on GA traffic is unlikely to change compared with the baseline.	
GA/Commercial Airlines	Economic Impact from Increased Effective Capacity	
	This option could enable airport capacity which could result in an economic benefit over the baseline for commercial traffic. However, other non-airspace constraints may hinder capacity and economic gains at Biggin Hill. No impact on GA is expected.	
GA/Commercial Airlines	Fuel Burn	
	This design option could provide shorter arrival routes compared with today’s PM structure. This facility could be provided alongside another facility to the east, therefore, providing additional (shorter) arrival routes for traffic from the west. This could reduce fuel burn for each flight compared with the baseline for commercial traffic. There are currently structures in this location (for other LTMA airfields) so no change in impact is expected.	
Commercial Airlines	Training Costs	
	Flight procedures change worldwide with each AIRAC cycle and operators would update their procedures accordingly, training staff if required. This option is not anticipated to impose additional training cost impacts for operators.	
Commercial Airlines	Other Costs	
	No other operator costs are foreseen.	
Airport / ANSP	Infrastructure Costs	
	This design option is not expected to change airport or ANSP infrastructure impacts, beyond the initial deployment phase which will require some systems engineering adaptations.	
Airport / ANSP	Operational Costs	
	This design option is not expected to change airport or ANSP operational cost impacts.	
Airport / ANSP	Deployment Costs	
	At this stage it is disproportionate to attempt to quantify deployment costs per design option. However, a large LTMA system change would involve training a large number of controllers and assistants via the use of various air traffic simulators (including sim prep, management, and staffing), with additional system engineering costs.	
AMS	Performance against the vision and parameters/strategic objectives of the AMS	
	<ul style="list-style-type: none"> • Safety: maintained • Simplification: could improve disruption recovery and enable airport capacity, maintain delay absorption and maintain network capacity. Could worsen ATCO workload. Will utilise aircraft performance capabilities • Integration of diverse users: continues to integrate defence and security and GA, subject to constraints of the design • Environmental sustainability: could reduce CO₂ emissions 	

Qualitative Safety Assessment

A high-level safety appraisal for this proposed option indicates that a shared Inner Hold to the west would at least maintain current safety performance. There are multiple holds within current UK airspace which have a proven safety performance. This option may increase complexity due to multiple ATCOs being required to coordinate Biggin Hill arrivals from both the east and west. An arrival structure in this location would need to deconflict with all Heathrow traffic and Gatwick departures.

Conclusion from IOA

Compared to the baseline, this option could improve disruption recovery, fuel burn, CO₂ emissions, and enable airport capacity. It would maintain safety and any current MoD access; it could maintain delay absorption, access to other users and network capacity. However, it could increase ATCO workload.

Therefore, KB – IH – W (Shared) is progressed to Stage 3 for further development.

Table 19 KB-IH-W (Shared) Initial Options Appraisal

KB - PM – NE (Maybe shared) Qualitative Initial Impacts Assessment		PROGRESSED
Group	Impact	
Communities	Noise impact on health and quality of life	
	ANG (2017) states “at or above 7,000ft...minimising of noise is no longer a priority”. CAP1616 instructs sponsors to consider noise and tranquillity impacts where the proposal has the potential to change overflight of inhabited areas, AONBs and NPs below 7,000ft. In this network-level proposal, changes would not occur below 7,000ft therefore these impacts are not considered.	
Communities	Air Quality	
	ANG (2017) states “emissions from aircraft above 1,000ft are unlikely to have a significant impact on local air quality”. Changes would occur at or above 7,000ft, thus in accordance with ANG (2017) there would be no change in local air quality impacts.	
Wider Society	Greenhouse Gas Impacts	
	As either an independent or shared facility, an optimised PM structure could reduce GHG emissions compared to the baseline. However, this location is partially aligned with airport traffic flows. Overall, GHG emissions could be maintained compared with the baseline.	
Wider Society	Capacity / Resilience	
	Capacity: If the PM is a shared facility, there could be no change to airport capacity. However, if this is an independent facility, there could be an increase compared with the baseline. This location does not align with network traffic flows. Other non-airspace constraints may hinder overall capacity gains at Biggin Hill. Resilience: As either an independent or shared facility, disruption recovery could be similar to the baseline, with a contingency hold ⁴ utilised in the event of unplanned runway closure. This option could provide a greater number of holding levels, therefore it could improve delay absorption compared with the baseline.	
General Aviation (GA)	Access	
	As either an independent or shared facility, an arrival facility to the northeast would likely be within current day CAS. As a result, the access impact on GA traffic is unlikely to change compared with the baseline.	
GA/Commercial Airlines	Economic Impact from Increased Effective Capacity	
	A shared facility could have no short-term change in impact. In the long term, a shared facility may limit capacity resulting in increased likelihood of delays/holding. This could lead to a negative economic impact for commercial operators. No impact on GA is expected. An independent facility could enable airport capacity which could result in an economic benefit over the baseline for commercial traffic. However, other non-airspace constraints may hinder capacity and economic gains at Biggin Hill. Also, an independent facility could create network inefficiencies over the current baseline (shared facility). This is due to the extended track distance or inefficient profiles required by the network traffic, to deconflict from the additional arrival structure, resulting in increased fuel burn. This could have a negative economic impact on other LTMA traffic – commercial and GA.	
GA/Commercial Airlines	Fuel Burn	
	As either an independent or shared facility, an optimised shared PM structure could reduce fuel burn compared to the baseline. However, this location is partially aligned with airport traffic flows. Overall, fuel burn could be maintained for each flight compared with the baseline. There are currently structures in this location (for other LTMA airfields) so no change in GA impact is expected. An independent facility could create network inefficiencies over the current baseline (shared facility). This is due to the extended track distance or inefficient profiles required by the network traffic, to deconflict from the additional arrival structure, resulting in increased fuel burn. This could have a negative economic impact on other LTMA traffic – commercial and GA.	
Commercial Airlines	Training Costs	
	Flight procedures change worldwide with each AIRAC cycle and operators would update their procedures accordingly, training staff if required. This option, either shared or independent, is not anticipated to impose additional training cost impacts for operators.	
Commercial Airlines	Other Costs	
	No other operator costs are foreseen, as either an independent or shared facility.	
Airport / ANSP	Infrastructure Costs	
	This design option, either shared or independent, is not expected to change airport or ANSP infrastructure impacts, beyond the initial deployment phase which will require some systems engineering adaptations.	
Airport / ANSP	Operational Costs	
	This design option, either shared or independent, is not expected to change airport or ANSP operational cost impacts.	

⁴ The positioning and altitude of this contingency hold would be the subject of collaborative work with the airport in Stage 3.

Airport / ANSP	Deployment Costs
At this stage it is disproportionate to attempt to quantify deployment costs per design option, either an independent or shared. However, a large LTMA system change would involve training a large number of controllers and assistants via the use of various air traffic simulators (including sim prep, management, and staffing), with additional system engineering costs.	
AMS	Performance against the vision and parameters/strategic objectives of the AMS
AMS Assessment – Independent Option	
<ul style="list-style-type: none"> • Safety: maintained • Simplification: could improve disruption recovery and enable airport capacity, maintain delay absorption and maintain ATCO workload. Could worsen network capacity. Will utilise aircraft performance • Integration of diverse users: continues to integrate defence and security and GA, subject to constraints of the design • Environmental sustainability: could maintain CO₂ emissions. Could result in network inefficiencies 	
AMS Assessment – Shared Option	
<ul style="list-style-type: none"> • Safety: maintained • Simplification: could improve delay absorption, maintain airport capacity, maintain disruption recovery, maintain airport capacity, and maintain ATCO workload. Could worsen network capacity. Will utilise aircraft performance capabilities • Integration of diverse users: continues to integrate defence and security and GA, subject to constraints of the design • Environmental sustainability: could maintain CO₂ emissions 	
Qualitative Safety Assessment	
A high-level safety appraisal for this proposed option indicates that a shared Point Merge to the northeast would at least maintain current safety performance. There is a Point Merge in current UK airspace which has a proven safety performance. An arrival structure in this location would need to deconflict with all London City and Heathrow traffic, Stansted departures and Northolt arrivals.	
Conclusion from IOA	
Compared to the baseline, an independent facility could improve delay absorption and enable airport capacity. A shared facility in this location could limit capacity gains. As either an independent or shared facility, it would maintain safety and any current MoD access; it could maintain fuel burn, CO ₂ emissions, access to other users, and ATCO workload. Either facility could worsen network capacity.	
Therefore, KB – PM – NE (Maybe shared) is progressed to Stage 3 for further development.	

Table 20 KB-PM-NE (Maybe shared) Initial Options Appraisal

KB – PM – E (DM) (Maybe shared) Qualitative Initial Impacts Assessment		PROGRESSED
Group	Impact	
Communities	Noise impact on health and quality of life	
	ANG (2017) states “at or above 7,000ft...minimising of noise is no longer a priority”. CAP1616 instructs sponsors to consider noise and tranquillity impacts where the proposal has the potential to change overflight of inhabited areas, AONBs and NPs below 7,000ft. In this network-level proposal, changes would not occur below 7,000ft therefore these impacts are not considered.”	
Communities	Air Quality	
	ANG (2017) states “emissions from aircraft above 1,000 ft are unlikely to have a significant impact on local air quality”. Changes would occur at or above 7,000ft, thus in accordance with ANG (2017) there would be no change in local air quality impacts.	
Wider Society	Greenhouse Gas Impacts	
	As either an independent or shared facility, an optimised PM structure could reduce GHG emissions compared to the baseline. This location is aligned with airport traffic flows, so it could reduce GHG emissions for each flight compared with the baseline.	
Wider Society	Capacity / Resilience	
	Capacity: If the PM is a shared facility, there could be no change to airport capacity. If this was an independent facility, there could be an increase in airport capacity compared with the baseline. To make this independent, an additional facility would be required for London City, which could negatively impact network traffic flows. Other non-airspace constraints may hinder overall capacity gains at Biggin Hill. Resilience: As either an independent or shared facility, disruption recovery could be similar to the baseline, with a contingency hold ⁵ utilised in the event of unplanned runway closure. This option could provide a greater number of holding levels; therefore, it could improve delay absorption compared with the baseline.	
General Aviation (GA)	Access	
	As either an independent or shared facility, an arrival facility to the east would likely be within current day CAS. As a result, the access impact on GA traffic is unlikely to change compared with the baseline.	
GA/Commercial Airlines	Economic Impact from Increased Effective Capacity	
	A shared facility could have no short-term change in impact. In the long term, a shared facility may limit capacity resulting in increased likelihood of delays/holding. This could lead to a negative economic impact for commercial operators. No impact on GA is expected. An independent facility could enable airport capacity which could result in an economic benefit over the baseline for commercial traffic. However, other non-airspace constraints may hinder capacity and economic gains at Biggin Hill. An independent facility could create network inefficiencies over the current baseline (shared facility). This is due to the extended track distance or inefficient profiles required by the network traffic, to deconflict from the additional arrival structure, resulting in increased fuel burn. This could have a negative economic impact on other LTMA traffic – commercial and GA.	
GA/Commercial Airlines	Fuel Burn	
	As either an independent or shared facility, an optimised shared PM structure could reduce fuel burn compared to the baseline. This location is aligned with airport traffic flows. Overall, it could reduce fuel burn for each flight compared with the baseline. The structure could be in current day CAS, there are currently structures in this location (for other LTMA airfields) so no change in GA impact is expected. An independent facility could create network inefficiencies over the current baseline (shared facility). This is due to the extended track distance or inefficient profiles required by the network traffic, to deconflict from the additional arrival structure, resulting in increased fuel burn. This could have a negative impact on all LTMA traffic – commercial and GA.	
Commercial Airlines	Training Costs	
	Flight procedures change worldwide with each AIRAC cycle and operators would update their procedures accordingly, training staff if required. This option, either shared or independent, is not anticipated to impose additional training cost impacts for operators.	
Commercial Airlines	Other Costs	
	No other operator costs are foreseen, as either an independent or shared facility.	
Airport / ANSP	Infrastructure Costs	
	This design option, either shared or independent, is not expected to change airport or ANSP infrastructure impacts, beyond the initial deployment phase which will require some systems engineering adaptations.	
Airport / ANSP	Operational Costs	
	This design option, either shared or independent, is not expected to change airport or ANSP operational cost impacts.	

⁵ The positioning and altitude of this contingency hold would be the subject of collaborative work with the airport in Stage 3.

Airport / ANSP	Deployment Costs
At this stage it is disproportionate to attempt to quantify deployment costs per design option, either an independent or shared. However, a large LTMA system change would involve training a large number of controllers and assistants via the use of various air traffic simulators (including sim prep, management, and staffing), with additional system engineering costs.	
AMS	Performance against the vision and parameters/strategic objectives of the AMS
AMS Assessment – Independent Option	
<ul style="list-style-type: none"> • Safety: maintained • Simplification: could enable airport capacity, maintain disruption recovery, maintain delay absorption, and maintain ATCO workload. Could worsen network capacity. Will utilise aircraft performance capabilities • Integration of diverse users: continues to integrate defence and security and GA, subject to constraints of the design • Environmental sustainability: could reduce CO₂ emissions. Could result in network inefficiencies 	
AMS Assessment – Shared Option	
<ul style="list-style-type: none"> • Safety: maintained • Simplification: could maintain airport capacity, network capacity, delay absorption, disruption recovery and ATCO workload. Will utilise aircraft performance capabilities • Integration of diverse users: continues to integrate defence and security and GA, subject to constraints of the design • Environmental sustainability: could reduce CO₂ emissions 	
Qualitative Safety Assessment	
A high-level safety appraisal for this proposed option indicates that a shared Point Merge to the east would at least maintain current safety performance. There is a Point Merge in current UK airspace which has a proven safety performance. An arrival structure in this location would need to deconflict with London City and Southend traffic.	
Conclusion from IOA	
Compared to the baseline, an independent facility could enable airport capacity. A shared facility in this location could maintain airport capacity. As either an independent or shared facility, there could be reduced fuel burn and CO ₂ emissions. It would maintain safety and any current MoD access; it could maintain disruption recovery, delay absorption, access to other users, network capacity, and ATCO workload.	
Therefore, KB – PM – E (DM) (Maybe shared) is progressed to Stage 3 for further development.	

Table 21 KB-PM-E (DM) (Maybe shared) Initial Options Appraisal

4. Step 2B Conclusion and Next Steps

4.1.1 There is not yet enough detailed quantified data to make a statement on preferred option(s). Compromises and trade-offs may be necessary between airports taking part in the FASI regional airspace change. Appropriate quantitative assessments and trade-offs will be carried out as part of Stage 3 to allow a preferred option to be selected prior to consultation.

4.1.2 This table provides a summary of the Stage 2 design work undertaken for Biggin Hill, showing how the number of design options has changed through the design development stages as described above.

Module	Initial Long List	Comprehensive List	Progress to IOA	Progress to Stage 3
Biggin Hill	15	8	7	7

Table 22 Count of Design Options for each module through option development stages

4.1.3 These shortlisted viable options have been carried forward to Stage 3:

Biggin Hill Design Options progressed to Stage 3
Inner Holds - Northeast
Inner Holds - East
Inner Holds – Southeast
Inner Holds – Southwest (Shared)
Inner Holds – West (Shared)
Point Merge – Northeast (Maybe shared)
Point Merge – East (DM)

Table 23 Summary of design options progressed to Stage 3

5. APPENDIX 1: Arrival Structure Concepts

5.1.1 Arrival structure types identified as being viable options for potential airspace designs across the LTMA airports:

Structure	Diagram	Description
Optimised⁶ Holds <small>Illustration of network/airport boundary (indicative c.7,000ft)</small>		<p>A holding pattern is used to delay aircraft from landing, in a vertically separated stack. ATC control entry to, and exit from, the stack; and aircraft are vectored to the runway or may use a transition. Linked with either a traditional Radar Manoeuvring Area (RMA) or Transitions. This design is for holds within c.30nm of the airport.</p>
Holds Further Out <small>Illustration of network/airport boundary (indicative c.7,000ft)</small>		<p>As above but would typically be higher. This design is for holds c.30nm-60nm from the airport.</p>
Point Merge <small>Illustration of network/airport boundary (indicative c.7,000ft)</small>		<p>Point Merge (PM) is a systemised method for sequencing arrival flows, allowing controllers to sequence and merge arrivals without vectoring, whilst enabling continuous descent operations and maintaining runway throughput. This design has a fixed location regarding the merge legs and merge point.</p>
Switch Merge <small>Illustration of network/airport boundary (indicative c.7,000ft)</small>		<p>SM is a concept not currently in UK operation, whereby two separate PM structures exist within a given airspace volume to serve different runway directions for the same airport. The merge legs and merge point (the tip of each triangle) is angled to favour the runway in use, but only one of the merge structures is in operation at any time; they are 'switched' when the runway direction changes. The holds do not change.</p>
Trombone <small>Illustration of network/airport boundary (indicative c.7,000ft)</small>		<p>A 'snake-like' PBN transition which can be closed (fixed) which aircraft must fly; or open, whereby tactical flexibility is retained with defined short cuts.</p>

Figure 6 Arrival structure concepts (at and above 7,000ft)

⁶ See paragraph 2.2.10 of Master document for explanation of 'Optimised'

End of document